

1 JOHN J. PICCIONE, ESQ.
2 Piccione, Keeley & Associates, Ltd.
3 122C South County Farm Road
4 Wheaton, IL 60187
5 630/653-8000
6 Attorney for Movant: Lauren B. Arch

FILED
1999 JUL 12 P 12:14
CLERK OF COURT
U.S. DISTRICT COURT
DISTRICT OF ARIZONA

6 UNITED STATES BANKRUPTCY COURT
7 DISTRICT OF ARIZONA

8 In Re:
9 BCE WEST, L.P., et al.,
10 Debtors.

Chapter 11
Case Nos. 98-12547
through 98 12570 ECF CGC
Jointly Administered

11 EID#38-3196719

12 LAUREN B. ARCH,
13 Movant,

EIGHTEENTH JUDICIAL CIRCUIT
DU PAGE COUNTY, WHEATON,
ILLINOIS

14 vs.

Case No. 98 SC 5192

15 B.C. GREAT LAKES, L.L.C. d/b/a
16 BOSTON MARKET RESTAURANT,
17 STORE NO. 419,

Respondent.)

NOTICE OF FILING OF MOTION
FOR RELIEF FROM THE AUTOMATIC
STAY AND REQUIREMENT TO FILE
OBJECTION

19 NOTICE IS GIVEN that the above Movant has filed a Motion requesting relief from
20 the automatic stay, the details of which are as follows:

22 On September 26, 1996, Movant, LAUREN B. ARCH, was injured in a Boston
23 Market in DuPage County, Illinois. She has filed a lawsuit alleging damages. On
24 September 26, 1996, there was an insurance policy with the Wausau Insurance Company
25 in full force and effect with a policy limit of \$1,000,000.00, which cover's Movant's loss.

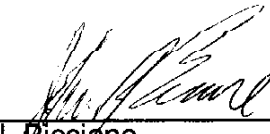
1 Movant seeks relief from the automatic stay to proceed against the insurance proceeds
2 only.

3
4 **FURTHER NOTICE IS GIVEN** that pursuant to Local Bankruptcy Rule 4001 if no
5 written objection is filed with the Court and a copy served on Movant whose address is:

6
7 John J. Piccione, Esq.
8 Piccione, Keeley & Associates, Ltd.
9 122C South County Farm Road
10 Wheaton, IL 60187

11 **WITHIN 15 DAYS** of service of the Motion, the Motion for relief from the automatic
12 stay may be granted without further hearing.

13 DATED: July 7, 1999

14
15 BY: 
16 John J. Piccione
17 One of the Attorneys for Movant
18 **PICCIONE, KEELEY & ASSOCIATES, LTD.**
19 Attorneys of Record for Movant
20
21
22

23 Copies of the foregoing mailed
24 on July 7, 1999, to:

25 See Attached Service List

26 J:\COLLECT\ARCH\NOTICEBK\WPDTJ.la;rev7/6/99fy

SERVICE LIST

Debtor:

Boston Chicken, Inc.
Attention: Michael Daigle
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Golden, CO 80401-4086

Attorneys for Debtor:

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711 Louisiana, Suite 1900
Houston, TX 77002

and

Randolph J. Haines
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40 North Central Avenue
Phoenix, AZ 85004-4429

U.S. Trustee:

United States Trustee
2929 North Central Avenue, #700
P. O. Box 36170
Phoenix, AZ 85067-6170

Attorneys for Official Unsecured Creditors Committee:

Evan D. Flaschen and Richard Casher
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One State Street
Hartford, CT 06103-3178

and

Donald Gaffney
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Official Unsecured Creditors Comm:

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Metin Caner
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Official Unsecured Creditors Committee:

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Attorney for Mid Atlantic Restaurant
Systems d/b/a Boston Market

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Attorney for B.C. Great Lakes, L.L.C.
d/b/a Boston Market Restaurant,
Store No. 419

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